

6. List all contracts and other instructions required to be filed by Section 73.3613 of the Commission's Rules and Regulations. (Only licensees, permittees, or a reporting entity with a majority interest in or that otherwise exercises de facto control over the subject licensee or permittee shall respond.)

Description of contract or instrument	Name of person or organization with whom contract is made	Date of Execution	Date of Expiration

7. Capitalization (Only licensees, permittees, or a reporting entity with a majority interest in or that otherwise exercises de facto control over the subject licensee or permittee, shall respond.)

Class of Stock (preferred, common or other)	Voting or Non-voting	Number of Shares			
		Authorized	Issued and Outstanding	Treasury	Unissued
COMMON	VOTING	1,000,000	100	-0-	999,900

Remarks concerning family relationships, attribution exemptions and certifications: (See Instructions 4, 5 and 6)

Don Linder and John Linder are father and son

Officers, directors, cognizable stockholders and partners. Use one column for each individual or entity. Attach additional pages, if necessary. See Instructions and 6.

Read carefully - The numbered items below refer to line numbers in the following table.)

Name and residence of officer, director, cognizable stockholder or partner (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List officers first, then directors and, thereafter, remaining stockholders and partners.

2. Citizenship.

3. Office or directorship held.

4. Number of shares or nature of partnership interest.

5. Number of votes.

6. Percentage of votes.

7. Other existing attributable interests in any other broadcast station, including nature and size of such interest.

8. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in Sections 73.3555 and 76.501 of the Commission's Rules, including the nature and size of such interests and the position held.

1	(a)	(b)	(c)
	Don Linder 117 Hannah Mankato, MN 56001	John Linder 126 Ridge Lane Mankato, MN 56001	Mark McVey 620 Lake Road Ottumwa, IA 52501
2	U.S.	U.S.	U.S.
3	President/Director	Sec./Treas./Director	Vice President/Director
4	75	5	20
5	75	5	20
6	75 %	5 %	20 %
7	See Exhibit 1	See Exhibit 1	none
8	none	none	none

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT
AND THE PAPERWORK REDUCTION ACT**

The solicitation of personal information requested in this Report is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to assess compliance with the Commission's multiple ownership restrictions. The staff, consisting variously of attorneys and examiners, will use the information to determine such compliance. If all the information requested is not provided, processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to retain your authorization.

EXHIBIT 1

Don Linder has the following broadcast interest: .

- 92.34 % voting shareholder, officer and director of Minnesota Valley Broadcasting Company, licensee of ~~KTOE~~ (AM) Mankato, MN, and KDOG (FM) North Mankato, MN.

Minnesota Valley Broadcasting Company owns 100 % of KMHL Broadcasting Company, licensee of KMHL (AM) and KKCK (FM) Marshall, MN.

- 80 % voting shareholder, officer and director of Linder Broadcasting of fort Dodge, Inc., licensee of KRIT (FM) Clarion, Iowa.
- 75 % voting shareholder, officer and director of O-Town Communications, Inc., licensee of KKSI (FM), Eddyville, Iowa.

John Linder has the following broadcast interests:

- 1.53 % voting shareholder, officer and director of Minnesota Valley Broadcasting Company, licensee of KTOE (AM), Mankato, MN, and KDOG (FM) North Mankato, MN.
- 100 % voting shareholder, officer and director of Mad Hatter Broadcasting company, licensee of KLKK (FM), Clear Lake, Iowa.
- 5 % voting shareholder, officer and director of O-Town Communications, Inc., licensee of KKSI (FM) Eddyville, Iowa.
- 20 % voting shareholder, officer and director of Linder Broadcasting of Fort Dodge, Inc., licensee of KRIT (FM) Clarion, Iowa.

-Permittee for a new FM station at Granite Falls, MN (File No. BPH-890417 MD).

EXHIBIT E

CERTIFICATION

I certify that I am Vice-President
(Official title, see instruction 1)
of O-Town Communications, Inc.
(Exact legal title or name of respondent)

that I have examined this Report, that to the best of my knowledge and belief,
all statements in the Report are true, correct and complete.

(Date of certification must be within 60 days of the date shown in Item 1 and
in no event prior to Item 1 date):

Maile MCG Oct. 14 1991
(Signature) (Date)

Telephone No. of respondent (Include area code):

(515) 682-0498

Any person who willfully makes false statements on this report can be punished
by fine or imprisonment. U.S. Code, Title 18, Section 1001.

Name and Post Office Address of respondent:

O-Town Communications, Inc.
620 Lake Road
Ottumwa, Iowa 52501

4. Name of entity, if other than licensee or permittee, for which report is filed
(see instruction 3):

none

5. Respondent is:

- ☐ Sole Proprietorship
☒ For-profit corporation
☐ Not-for-profit corporation
☐ General Partnership
☐ Limited Partnership
☐ Other: _____

If a limited partnership, is certification statement included as in instruction 4?

☐ Yes ☐ No

Ownership Report

NOTE: Before filling out this form, read attached instructions.

Section 310(d) of the Communications Act of 1934 requires that consent
of the Commission must be obtained prior to the assignment or transfer of
control of a station license or construction permit. This form may not be used
to report or request an assignment of license/permit or transfer of control
(except to report an assignment of license/permit or transfer of control made
pursuant to prior Commission consent).

1. All of the information furnished in this Report is accurate as of

September 1 19 91

(Date must comply with Section 73.3618(e), i.e., information must be
current within 60 days of the filing of this report, when 1(a) below is
checked.)

This report is filed pursuant to instruction (check one)

1(a) ☒ Annual 1(b) ☐ Transfer of Control or
Assignment of License 1(c) ☐ Other

or the following stations:

Call Letters	Location	Class of service
KKSI	Eddyville, Iowa	FM

2. Give the name of any corporation or other entity for whom a separate
Report is filed due to its interest in the subject licensee (See instruction 3):

none

3. Show the attributable interests in any other broadcast station of the
respondent. Also, show any interest of the respondent, whether or not
attributable, which is 5% or more of the ownership of any other
broadcast station or any newspaper or CATV entity in the same market
or with overlapping signals in the same broadcast service, as described
in Sections 73.3685 and 76.801 of the Commission's Rules.

none

2. If the registrant is a corporation, partnership, or other entity, the registrant shall identify the person or persons who are the beneficial owners of the securities of the registrant, and the registrant shall identify the person or persons who are the beneficial owners of the securities of the registrant.

Description of contract or instrument	Name of person or organization with whom contract is made	Date of Execution	Date of Expiration

Capitalization (Only licensees, permittees, or a reporting entity with a majority interest in or that otherwise exercises de facto control over the subject licensee or permittee, shall respond.)

Class of Stock (preferred, common or other)	Voting or Non-voting	Authorized	Number of Shares Issued and Outstanding	Treasury	Unissued
Common	voting.	1,000,000	100	-0-	999,900

Notes concerning family relationships, attribution exemptions and certifications: (See instructions 4, 5 and 6)

Don Linder and Bruce Linder are father and son.

3. List officers, directors, cognizable stockholders and partners. Use one column for each individual or entity. Attach additional pages, if necessary. See instructions 4, 5, and 6.

Line (Read carefully - The numbered items below refer to the numbers in the following table.)

1. Name and residence of officer, director, cognizable stockholder or partner (If other than individual also show name, address and citizenship of natural person authorized to vote the stock). List officers first, then directors and, thereafter, remaining stockholders and partners.
2. Citizenship.
3. Office or directorship held.
4. Number of shares or nature of partnership interest.
5. Number of votes.
6. Percentage of votes.
7. Other existing attributable interests in any other broadcast station, including nature and size of such interest.
8. All other ownership interests of 5% or more (whether or not attributable as well as any corporate officership or directorship, in broadcast, cable or newspaper entities in the same market or with overlapping signals the same broadcast service, as described in Sections 73.3655 and 76.8 of the Commission's Rules, including the nature and size of such interest and the position held.

1	(a) Don Linder 114 Hannah Mankato, MN	(b) Bruce Linder 215 Lake Avenue Spicer, MN	(c) Mark McVey 620 Lake Road Ottumwa, IA
2	U.S.	U.S.	U.S.
3	President, Director	Sec./Treas./Dir.	Vice President, Dir.
4	55	25	20
5	55	25	20
6	55%	25%	20%
7	See Exhibit 1	See Exhibit 1	none
8	none	none	none

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT
AND THE PAPERWORK REDUCTION ACT**

The solicitation of personal information requested in this Report is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to assess compliance with the Commission's multiple ownership restrictions. The staff, consisting variously of attorneys and examiners, will use the information to determine such compliance. If all the information requested is not provided, processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to retain your authorization.

KCSI (FM) Eddyville, Iowa
O-Town Communications, Inc.
Ownership Report

Exhibit 1

Don Linder has the following broadcast interests:

-92.34% voting shareholder, officer and director of Minnesota Valley Broadcasting Company

-Minnesota Valley Broadcasting Company is the licensee of KTOE(AM) Mankato, MN and KDOG(FM) North Mankato, MN. It also owns 100% of KMHL Broadcasting Company, licensee of KMHL(AM) and KCKK(FM) Marshall, MN; and owns 49% of Waite Park Broadcasting Company, permittee for a new station at Le Sueur, MN.

-80% voting shareholder, officer and director of Linder Broadcasting of Fort Dodge, Inc., licensee of KRIT(FM) Clarion, IA.

Bruce Linder has following broadcast interests:

-49% general partner of Rogers Broadcasting Company, permittee of a new FM station at St. James, MN

State of Iowa)
)
County of Jefferson) ss:

AFFIDAVIT OF DAVID W. BROWN

I, David W. Brown, being first duly sworn, do hereby state as follows:

1. I am president of Rivertown Communications Company, Inc., an applicant for a new FM Station at Eldon, Iowa, to operate on Channel 282Cs. I was the proponent of the Channel 282 allocation to Eldon in January 1991.

2. In June, 1991, I was visiting at the home of Mark McVey in Ottumwa, Iowa. Mr. McVey is chief engineer and 20% stockholder of O-Town Communications, Inc., licensee of KKSI-FM, Eddyville, Iowa. (He and I have been acquainted since 1981, and we have worked concurrently at several Iowa stations in the past ten years -- such as KRIT, Clarion, Iowa [owned by the Linder family] and KMCD(AM) and KIIK-FM, Fairfield, Iowa.) During this visit in June 1991, he mentioned my petition for channel 282 at Eldon, and asked if I had located a tower site. I said that I had not. He asked me to consider rebroadcasting KKSI-FM if I were to be awarded the Eldon permit. I responded that it was too early to even think about that. I asked him whether the Linders (who own the remaining 80% of KKSI) were aware of my Eldon petition, and he said that they were. I asked if they planned to file an application for Eldon, and he said he didn't know.

3. On January 18, 1992, Mr. McVey was at KKMI-FM, Burlington, Iowa (where I was employed as Station Manager), to perform maintenance on its transmitter. He brought up the

subject of the Eldon applications (Rivertown's, and that of Sample Broadcasting Co., L.P.), and stated that the Sample application had been filed to delay the grant of mine, or to prevent me from getting the Eldon station. He said that the Sample transmitter site had been selected to the southeast of Eldon to avoid city-grade contour overlap with KKSI-FM, to enable Bruce Linder to have ownership interests in both stations. He said that the Linders were using Carmela Sample, KKSI's News Director, because of her minority (Hispanic) status. He said that she was bragging about what she was going to do with the Eldon station if her application is granted, and that, in his opinion, she had failed to recognize that Bruce Linder will be controlling her and the station.

4. On March 17, 1992, I had dinner with Mark McVey at the Southside Pizza Hut in Ottumwa. Again, he brought up the Eldon situation. He stated that he had been asked by "the Linders" (he was not more specific) to find a transmitter site for the Sample application which would enable city-grade coverage of Eldon without overlapping the city-grade contour of KKSI; that Bruce Linder has a 20% interest in KKSI; that, if Sample is successful, they plan to simulcast KKSI-FM; and that, although he was not familiar with the details concerning the arrangement between Carmela Sample and Bruce Linder, he was certain that the Linders would not let her manage the Eldon station, because of her lack of management experience.

5. On April 9, 1992, Bill Collins (who currently is employed at KKMI-FM, Burlington) advised me that in April 1991

(when Collins was employed by Station KKSI-FM), he had a conversation concerning my Eldon petition for rulemaking with Mark McVey. McVey had learned of my Eldon petition, and had said, in the presence of Bill Collins, that "we ought to get Carmela [Sample] to file on that frequency, and then what we ought to do is tie them together so you would have KKSI-FM from here to the Mississippi River." Mr. Collins further informed me on April 9, 1992, that approximately one week earlier (that is, about April 1, 1992), Mark McVey had telephoned him and again brought up the subject of tying KKSI and the Eldon station together. and that McVey also suggested that the Linders would "have a place for David Brown" if I decided to go in with them.


David W. Brown

Subscribed and sworn to before me, a Notary Public, this 14 day of April, 1992, by David W. Brown.

(SEAL)

 2/8/93

State of Iowa)

County of Des Moines)

SSI

AFFIDAVIT OF WILLIAM D. COLLINS

I, William D. Collins, being first duly sworn, do hereby state as follows:

I am the "Bill Collins" identified in the affidavit of David W. Brown of this date. I have reviewed that affidavit, and affirm that its description of the conversations between myself and Mark McVey contained in paragraph 5 is true and correct, and is as I described those conversations to Mr. Brown on April 9, 1992.

William D. Collins
William D. Collins

Subscribed and sworn to before me, a Notary Public, this 14 day of April, 1992, by William D. Collins.

(SEAL)

Cathy J. Johnson



STATEMENT

I am Mark McVey. I have read the Petition to Deny the application of Sample Broadcasting Co., L.P., filed by Rivertown Communications Co., Inc., in which certain statements are attributed to me. I wish to respond.

Initially, I want to make it clear that I have no personal knowledge of the arrangement between Carmela Sample and Bruce Linder with regard to their Eldon, Iowa application. I have not spoken to either of them about their agreement, any understandings they may have, or any plans either of them may have made. Ms. Sample has asked me questions from time to time about equipment and methods of operating stations, such as satellite feeds, tape automation, and live announcing, and I have responded, but I do not know what, if any, decisions she may have made. I have no knowledge of any programming plans for the Eldon station. I have never heard either Ms. Sample or Mr. Linder say that the Eldon station would simulcast any part of KKSI's programming. I have not seen anything in writing regarding such an occurrence.

I have had little to do with the Eldon venture. Ms. Sample did ask me to assist in identifying the general geographical area where the proposed tower could be located. After she located the land area, I assisted her in determining if the land was of a suitable terrain and dimension for the antenna tower she proposes to erect. I have not had any other involvement with the Eldon application.

In the Petition to Deny, David Brown attributes to me a number of statements regarding Sample's Eldon application. He describes a

conversation in June 1991. I have no recollection of the details of that conversation, but I would not have asked him to consider rebroadcasting KKSI-FM. I believe we were discussing the different ways stations operate, and that start-up operations can be very expensive. I may have mentioned that local marketing agreements, commonly known as LMA's, were becoming popular, and might present a way of keeping losses down. If I mentioned any sort of connection between KKSI and a future Eldon station it would have been merely as a hypothetical application of our general discussion and a possible opportunity for O-Town Communications, if or when the Eldon station was applied for and built. As I recall, the FCC had not yet allotted any Channel to Eldon in June 1991.

Mr. Brown next refers to a January 18, 1992, conversation between us at KKMI-FM Burlington, Iowa. As I recall, I was working on that station's transmitter at about 3 A.M. He was there, and we did speak. I do not have a clear recollection of what was said. I do not recall saying that the Sample application had been filed to delay the grant of Mr. Brown's application, or to prevent him from getting the Eldon station. I would have had no basis to make such a statement, because I have no knowledge of any motive for the filing of the Sample application. No one, not Ms. Sample, not Mr. Linder, not anyone else, has ever said anything to me about the reason why the Sample application was filed. I have not seen anything in writing on that subject.

During this early morning conversation I do recall Mr. Brown stating that he and Mr. Pritchard were interested in purchasing KKSI-FM from O-Town Communications. He was stating that if they were to

purchase the station, they would make definite changes in station management and would streamline the station's operation. To my recollection, he indicated that an LMA with his Eldon station would be one way to cut costs. He asked me whether Sample Broadcasting would have an LMA agreement with KCSI. I believe that I responded to the effect that I was not aware of Ms. Sample's exact plans for the station and that he should talk directly to her for that information.

Mr. Brown also reports that I expressed my opinion that Bruce Linder will be controlling Ms. Sample and her station. Again, I cannot remember making any such statement, but even if I did, it would have been strictly an off-hand remark with no basis on any fact of which I am aware. As I said earlier, I have no knowledge of any of the arrangements between Ms. Sample and Mr. Linder, and have no way of knowing what type of owner Mr. Linder will be, passive or active. Mr. Linder has never mentioned any plans for the Eldon station to me, and I have seen no documents regarding any plans. Mr. Brown must have misinterpreted my statements, perhaps due to the late hour.

Whenever I spoke with Ms. Sample about her application, she has been very enthusiastic about the opportunity it presents for her to get into station ownership. She has always come across as a serious applicant.

Mr. Brown mentions a dinner meeting between the two of us on March 17, 1992. He does not mention that he suggested, and about insisted on, this meeting. Mr. Brown asked me if I would like to sell my interest in KCSI and merge with him and Ms. Sample as an applicant for Eldon. He also stated or implied that he was no longer working for

station KKMI and left me with the impression that he had a falling out with his employer, Mr. Pritchard, the owner of station KKMI. Of course, I could not speak for Ms. Sample. I insisted that he should speak directly with her. I arranged a meeting between them that same evening.

At no time did I say that Ms. Sample plans to simulcast KKSI-FM. I would not have said that, because I do not know Sample's plans for the station. At most I might have said that it was possible she might simulcast KKSI, but even if I did, I was speaking strictly for myself, and merely speculating as to a theoretical possibility.

Similarly, I do not recall saying that Ms. Sample would not be permitted to manage the Eldon station. I have no knowledge of any plans by Ms. Sample, Mr. Linder, or anyone else in that regard. Nothing I might have said about the Eldon station was based on my own knowledge, or anything anyone else might have said to me. I may have guessed out loud about future possibilities, but anything I might have said was strictly my own guess.

As to my recent conversation with Mr. Collins, I called him to see if he was interested in returning to work at KKSI. I may have asked him if Mr. Brown was out of work, and I might have stated that I would ask the Linders if they were interested in hiring Brown, but I also indicated that I doubted that was much of a possibility. I am doubly positive that I did not suggest or guarantee that the Linders would give David Brown a job. The Linders have told me that they are not interested in hiring Mr. Brown for any station. I may have spoken about IMAs during the conversation and I may have brought up that

Sample might simulcast KCSI. If I did, however, I was speaking strictly about a possible opportunity for station KCSI. I have no information that any LMA is planned for the Eldon station.

After reading the petition, I can only assume that whatever statements I may have made regarding the Eldon station were misunderstood or misinterpreted. As they appear in the Petition to Deny, they do not represent the truth.

Rivertown has additionally gone back to the history of the Eddyville application to try to show some relationship between it and the Eldon application. Rivertown omits significant facts in its tale, facts which show that the involvement of the Linders in station KCSI is completely legitimate.

When I filed the application for Eddyville, the Linders were not involved. I was relying upon a distant relative for financing. By the time that I needed the financing, my relative had died, and his heir did not want to fulfill his commitment. I was left without financing at that point, and had to locate a substitute source. It was only then that the Linders came into the picture. Rivertown's insinuation that the preparation and filing of the Eddyville construction permit application was in any way related to the Linders is completely wrong and I resent any indication otherwise.

I certify under penalty of perjury that the above statement is true and correct.

Date:

4/23/92

Paul A. Miller

STATEMENT

I am Carmela Sample, the general partner of Sample Broadcasting Co., L.P., an applicant for a new FM radio station at Eldon, Iowa. I have read the Petition to Deny filed by Rivertown Communications Co., Inc., in which certain allegations are made about my purpose in filing the application and my control of the station should the application be granted. I wish to respond.

Rivertown claims that the application is controlled by Bruce Linder, that the Eldon station will be controlled by him, and that the application was filed to delay or deny Rivertown from getting a station. Rivertown is incorrect on all counts.

I and no one else is and will be in control of the Eldon application. Bruce Linder is only a passive investor. As I represented to the Commission, I am and will be in total control of the application and the station. I filed the application for one reason only: it is an opportunity for me to obtain ownership and managerial control in a radio station. The opportunity to own and manage a radio station is something that I have thought about for a number of years. I did not file the application to delay or disrupt any application or for any other reason.

I do not know why Mr. McVey may have made the statements attributed to him, if in fact he did make them. I have never discussed my motive for filing my application with him; I believe he understood that I was strongly interested in getting and running my own station. I have never talked to him about my arrangement with Bruce Linder, and

have never said anything which would lead him or anyone to believe that Mr. Linder would be in control of the application or the radio station.

Mr. Linder has completely kept within the bounds of our partnership agreement. He has never tried to direct or control me or the application. He has told me that our partnership agreement will last for as long as we own the station. I am confident that he will permit me to exercise full managerial control over the station. I have known Mr. Linder since late 1990, and I have developed a respect for him and know him to be trustworthy and honest. He and I agreed that he will be a passive investor only. I have no basis to believe that he will dishonor that commitment. I have sole decision making authority and control over the application and will have the same over the new station. I would not have gone into this project without that confidence. His status as a part owner of station KCSI(FM) will have no bearing on the Eldon station.

I emphatically state that Mr. Linder had no part in preparing the application and has done nothing more than provide me with the necessary financing for this venture. Mr. Linder has not made, and has no authority to make, any decision with regard to the application or the new station. There has been no discussion about changing his role.

I personally have been in complete control of the application. I prepared the budget and completed the application form, with the assistance of my counsel and engineer, established the public file and took care of local publication of the filing notice. After I obtained topographic maps of the area surrounding Eldon, I asked Mark McVey to identify the geographic window where I could locate my transmitter and

antenna tower. With that information I personally spoke with landowners about land availability for a potential transmitter site. I then asked Mark McVey to view potential tower sites and give me his opinion as to which one was best suited for the tower I was considering. I obtained a site assurance letter from the landowner of the site I ultimately selected. When the land was later sold I met with the new owners and obtained continued assurance that I would be able to use the land for my transmitter site.

I also asked Mr. McVey's opinion about equipment and costs involved in various aspects of station operation. His responses were among the several sources I used to prepare my proposed budget. The partnership paid Mr. McVey for his consulting services. I never discussed my ultimate decisions for constructing or operating the station with Mr. McVey. Furthermore, I did not consider nor contemplate an IMA with station KKSI or any other radio station when I prepared and filed my application.

Rivertown's Petition to Deny fails to mention that I met with David Brown on March 17, 1992. No mention was made during that meeting of any IMA agreement between station KKSI(FM) and the station I am planning for Eldon. I do recall, however, that Mr. Brown proposed that he and I should join to form an applicant for the new radio station. In response, I declined the offer and indicated that I had worked very hard to prepare and file my construction permit application, have wanted ownership in a broadcast station for years, and was not interested in working with Mr. Brown.

The statements and representations which I made to the Commission

in my Eldon application were correct when they were made and remain correct today. There are no agreements or understandings other than those represented in the application.

In summary, Rivertown's accusations are completely wrong.

I certify under penalty of perjury that the above statement is true and correct.

April 27, 1992

C. Campbell

STATEMENT

I am Bruce H. Linder, the sole limited partner of Sample Broadcasting Co., L.P., an applicant for a new FM radio station at Eldon, Iowa. I have reviewed the Petition to Deny filed by Rivertown Communications Co., Inc. The Petition contains allegations about the application and my involvement in the partnership. I have prepared the following response.

Sample Broadcasting Co., L.P. is a business venture between myself and Carmela Sample. It has nothing to do with Donald Linder, John Linder, Mark McVey, O-Town Communications, Station KKSI-FM or any other third party. While I do have an ownership interest in O-Town Communications, it is an entirely separate business venture from Sample Broadcasting; these businesses have nothing to do each other. As a voting shareholder of O-Town Communications, I have a voice in the operation and management of the station. As a limited partner and strictly passive investor in the Eldon application, my sole involvement is my commitment to provide financing for the applicant and the station. I am completely passive, as provided by the partnership agreement.

The comments allegedly made by Mr. McVey regarding my family members or a relationship between the KKSI and the Eldon station are not based on any fact of which I am aware and in no way reflect my intentions. For example, I have never speculated what programming the Eldon station might have. If asked, I would refer people to Carmela Sample, who alone will make that decision. I will not even venture an opinion. Furthermore, I have no interest in hiring David Brown and I

have never so indicated. I have no information that any member of my family has agreed to employ David Brown or that any such employment is contemplated.

Since the time that Carmela and I agreed to form a limited partnership she has been solely responsible for all aspects of the application and for making plans for the new station. Because of my familiarity with Carmela's abilities and competence, I have complete faith in her choices and judgment with respect to the application and future radio station.

I agreed to join Sample Broadcasting Company, L.P., as a passive investor. I have no authority, ability nor desire to make any decision concerning the application or operation of the partnership or the station. Ms. Sample informs me periodically about the progress of the application, however, she has never asked me to make a decision for her or to ratify any decision which she has made concerning the application or the proposed station. I have exerted absolutely no influence over Ms. Sample's decisions concerning the Eldon station or the partnership, and I will not do so in the future.

I certify under penalty of perjury that the above statement is true and correct.

Date: 4-27, 1992

Bone H. Smith

CERTIFICATE OF SERVICE

I hereby certify that on this 29 day of April, 1992
a copy of the foregoing document was placed in the United States mail,
first class postage prepaid, addressed to the following:

Donald Ward, Esq.
P.O. Box 286
Washington, DC 20044-0286

Robin W. Zuer

State of Iowa)
) ss:
County of Jefferson)

AFFIDAVIT OF DAVID W. BROWN

I, David W. Brown, being first duly sworn, do hereby state as follows:

1. I have reviewed the Statements of Mark McVey and Carmela Sample submitted with the April 29 Opposition of Sample Broadcasting Co., L.P., to the Petition to Deny its application filed by Rivertown Communications Company on April 14, 1992.

2. Although Mr. McVey claims not to remember having made a number of the statements which I attributed to him in my affidavit of April 14, he stops short of denying that he made those statements. In denying any specific knowledge concerning the intentions of Ms. Sample and Mr. Bruce Linder, and claiming that "whatever statements I may have made regarding the Eldon station were misunderstood or misinterpreted," Mr. McVey appears to be conceding that my April 14 affidavit accurately set forth the substance of our conversations, but only failed to reflect that his statements represented no more than his own personal opinions, unaided by any substantive input from either Ms. Sample or Bruce Linder.

3. Aside from his speculation to me that Ms. Sample would find that she would be controlled by Bruce Linder (detailed at paragraph 3 of my April 14 affidavit), nothing that Mr. McVey said in our several conversations led me to believe that he was only expressing his personal opinions rather than his knowledge of events and decisions which had been made at KKSI -- where he

is employed, and of whose licensee he is an officer, director, and 20% stockholder. Thus, I believe that it was reasonable of me to assume that his statements were both knowledgeable and an accurate reflection of the intentions of the KKSI ownership vis-a-vis Sample's Eldon application.

4. Turning to the specifics of Mr. McVey's Statement, at the top of page 2, with reference to our June 1991 conversation (described at paragraph 2 of my April 14 affidavit), he claims that he "would not have asked [me] to consider rebroadcasting KKSI-FM," yet the balance of that paragraph is devoted to various ways such a concept "may have" been discussed. My memory is clear that he did ask me to consider rebroadcasting KKSI, and I agree with his statement that this would have represented "a possible opportunity for O-Town Communications," the KKSI licensee.

5. With respect to our discussion of January 18, 1992 (described at paragraph 3 of my April 14 affidavit), his claim (page 2) that such discussion occurred at 3 a.m., which he then uses to bolster his suggestion that I "must have misinterpreted [his] statements, perhaps due to the late hour" (page 3), is simply wrong. Mr. McVey came to the KKMI studios, where I was waiting for him, at about 10 p.m. on the evening of January 18. I showed him the new studio equipment which the owner (John Pritchard) had recently purchased; at approximately 11:15 we went to the KKMI transmitter site (approximately two miles away), where he remained until approximately 1:30 a.m. I stayed at the transmitter site only until about midnight, when I returned to